IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

Civil Action No. 5:21-CV-486-D

IRMA RODRIGUEZ and ETHEL)
DOLORES LAWSON, on behalf of)
themselves and all others similarly situated,)
Plaintiffs,)
)
V.) PLAINTIFFS' UNOPPOSED MOTION
) FOR ORDER GRANTING FINAL
RIVERSTONE COMMUNITIES, LLC,) APPROVAL OF CLASS ACTION
INDIAN CREEK PARENT, LLC,) SETTLEMENT
INDIAN CREEK MHP, LLC,	
INDIAN CREEK DEALER, LLC, and)
INDIAN CREEK ASSOCIATION, LLC,	
)
Defendants.)
)

Plaintiffs Irma Rodriguez and Ethel Dolores Lawson, on behalf of themselves and all others similarly situated, respectfully move the Court for an order granting final approval to the settlement in this class action and providing other such relief as this Court deems just and proper.

In support of this *Motion*, Plaintiffs attach the Declaration of American Legal Claim Services, LLC Regarding Due Diligence in Noticing, dated January 16, 2024, as Exhibit 1.

Plaintiffs will submit a proposed Final Approval Order and final judgment forthwith, after review by and consultation with Defendants.

For the reasons described in Plaintiffs' Memorandum of Law in support of this motion, Plaintiffs respectfully request that this Court grant the motion and enter final approval and final judgment in this case.

Respectfully submitted,

This the <u>19th</u> day of <u>January</u> , 2024.

For the North Carolina Justice Center:

/s/ Katharine Woomer-Deters

Katharine Woomer-Deters
NC Bar #33892
Jason Pikler (NC Bar #47128)
Carlene McNulty (NC Bar #12488)
P.O. Box 28068
Raleigh, North Carolina 27611
(919) 861-2072
(919) 856-2175 (fax)
kate@ncjustice.org
jason.pikler@ncjustice.org
carlene@ncjustice.org

Stuart T. Rossman* (BBO # 430640) Of Counsel NATIONAL CONSUMER LAW CENTER 7 Winthrop Square, 4th Floor Boston, MA 02110 (617) 542-8010 srossman@nclc.org

^{*}admitted pro hac vice

CERTIFICATE OF SERVICE

I certify that on this day the foregoing *Plaintiffs' Unopposed Motion for Order Granting Final Approval of Class Action Settlement* was served on the following counsel of record electronically via the court's CM/ECF system:

Corri A. Hopkins
Melanie Black Dubis
Scott E. Bayzle
PARKER POE ADAMS & BERNSTEIN, LLP.
301 Fayetteville Street, Suite 1400
Raleigh, North Carolina 27601
melaniedubis@parkerpoe.com
scottbayzle@parkerpoe.com
corrihopkins@parkerpoe.com

Joseph Aviv (Special Appearance)
Patrick Rawsthorne (Special Appearance)
HONIGMAN LLP
39400 Woodward Avenue, Suite 101
Bloomfield Hills, Michigan 48304
Telephone: (248) 566-8300
javiv@honigman.com
prawsthorne@honigman.com

This the 19th day of January , 2024.

For the North Carolina Justice Center:

/s/ Katharine Woomer-Deters
Katharine Woomer-Deters (NC Bar #33892)
NORTH CAROLINA JUSTICE CENTER
P.O. Box 28068
Raleigh, North Carolina 27611
Tel: (919) 861-2072

Fax: (919) 856-2175 kate@ncjustice.org